The Education Trust–Midwest

MICHIGAN NO CHILD LEFT BEHIND WAIVER ANALYSIS

In July 2012, the U.S. Department of Education approved Michigan's request for flexibility on portions of the No Child Left Behind Act.

Introduction

The U.S. Department of Education has given Michigan a rare opportunity to devise new educational systems that better serve our state's students, families and educators. In return, Washington has agreed to waive some provisions of No Child Left Behind. For instance, states will no longer have to ensure that all students are proficient in reading and math by 2014, so long as they adopt more rigorous academic standards and a meaningful system to support schools while holding them accountable.

The consequences of the waiver are high. Michigan's approved waiver request will impact:

- How well Michigan's teachers are able to prepare students to meet new academic standards;
- The helpfulness and reliability of information the state will provide to parents, students and educators on how well their public schools are actually performing;
- Michigan's ability to reliably and fairly evaluate educators' impact on student learning, and
- The identification of schools as failing and in need of improvement, which often dictates eligibility for state and federal dollars and intervention programs.

Below, we identify some strengths and weaknesses in Michigan's approved waiver request, and summarize how Michigan plans to implement three major requirements of the waiver: school accountability, support and public reporting system; the state's educator evaluation system; and the transition to Common Core state standards.

STRENGTHS OF MICHIGAN'S APPROVED WAIVER REQUEST

- Michigan has lacked a comprehensive school accountability system that ensures all schools are meeting the needs of all students, and it has not set improvement goals for all schools. Michigan's approved waiver request changes both – holding schools more accountable for the achievement and growth of all students and setting unique school improvement goals based on current performance.
- Schools that are farther behind overall will now have to improve at a faster rate. Unlike in the past, when all schools were expected to improve at the same rate, schools that have a longer way to go to reach the state-set proficiency goal for students will be required to improve faster than schools that are closer to the goal.
- Unlike in the past, when some traditional public and charter schools were not held accountable for their poorest performing students, all schools will now be held accountable in some ways for the performance

of all traditional subgroups – including low-income and minority students – and the performance of their lowest-performing 30% of students.

- The Michigan Department of Education (MDE) has proposed a color-coded accountability system that would label schools as Red, Orange, Yellow, Lime Green, or Dark Green based on student achievement. This approach will give parents more nuanced ratings and information to make informed, empowered decisions on how well their children are being educated and where to send their children to school.

WEAKNESSES OF MICHIGAN'S APPROVED WAIVER REQUEST

- Because of unusually aggressive annual improvement targets proposed by state officials, many schools will be in the bottom color categories, at least for the first few years of the new system. Michigan does not provide adequate supports or interventions for those schools that will fail to meet their goals but that are not identified as among the worst schools in the state.
- While the MDE identifies schools with the biggest gaps between the bottom and top 30% of students, it does not provide these schools with comprehensive strategies that are likely to help them close these gaps, such as supports to recruit teachers who have strong track records with low-performing students. This is particularly distressing in Michigan, which is one of only a handful of states that failed to narrow a single achievement gap since 2003. In 2011, the black-white achievement gap on the 4th-grade National Assessment of Educational Progress reading test was an unacceptable 34 points.
- The MDE does not provide evidence of the effectiveness of Michigan's strategies to improve the state's lowest-performing schools, and lacks research-based strategies that other states, such as Massachusetts, are using to improve and empower their struggling schools to raise student achievement, such as requiring that leaders of the lowest-performing schools have experience with successfully turning around a failing school.

SUMMARY OF MICHIGAN'S APPROVED WAIVER REQUEST

1. SCHOOL AND DISTRICT ACCOUNTABILITY AND SUPPORT SYSTEM – AND PUBLIC REPORTING

The U.S. Department of Education required that Michigan accurately identify schools most in need of support to improve student achievement, hold all schools accountable to ambitious but achievable goals, and provide differentiated supports and interventions based on three categories of schools:

- Priority Schools, the worst-performing 5% of Title I schools in the state. Title I schools receive federal funds for students living in poverty.
- Focus Schools, the worst-performing 10% of Title 1 Schools for graduation rates or achievement gaps.
- Reward Schools, schools with high performance or improvement rates.

What indicators are used to measure school performance?

- Proficiency rates in reading, math, writing, science, and social studies for all students who take the assessment, for the lowest-performing 30% of students in each school, and for the nine traditional NCLB student subgroups (white, black, Native American, Asian/Pacific Islander, Hispanic, multiracial, students with disabilities, students with limited English proficiency, and the economically disadvantaged).
- High school graduation rates.
- Changes in the performance of individual students.
- Size of gap between bottom and top 30% of students in each school.

How will these indicators be used?

- Indicators are combined into an index called the Top-to-Bottom List, in which each school is given a percentile ranking from 0 to 100. Exceptionally small schools are not included on this list, but the MDE has proposed a taskforce to address how to measure the performance of small schools as well.
- Schools are expected to demonstrate annual improvement toward a goal of 85% of its students being proficient by 2022 in each subject, overall and for each subgroup.
- If schools do not make their adequate yearly progress goal, they can qualify for a "safe harbor" goal if they demonstrate improvement rates greater than or equal to the 80th percentile of improvement. Safe harbor helps schools that are really far behind be acknowledged for their progress, even if they haven't reached their goals.
- Schools are expected to have small gaps between the bottom and top 30% of all students in the school. Schools are ranked by these gaps and schools with the biggest gaps will be identified as "Focus."

How are student subgroups (based on race, income, or other unique status) tracked?

- All nine NCLB student groups must meet the same proficiency goals as the school overall, ensuring that each of these groups is also on track to get to 85% proficiency by 2022.
- In addition, a new "bottom 30%" subgroup will be created and tracked in the same way as the other groups.
- Subgroups in each school can also make a "safe harbor" goal, by demonstrating an improvement rate at the 80th percentile of improvement across the state.
- The MDE tracks the gap between the bottom 30% of students and the top 30% of students at each school. But MDE's approved waiver request does not track achievement gaps separating historically disadvantaged groups – such as low-income, African American, Hispanic, English Language Learners and Students with Disabilities – from other student populations.

How are schools graded under the proposed statewide public reporting system?

- MDE will adopt a five-category color-coded system to grade schools, which will be used for the first time in August 2013.
    - Each school and its subgroups will get a "red" (0 points) for not meeting its yearly goal or safe harbor goal; a "yellow" (1 point) for meeting its safe harbor improvement goal, and a "green" (2 points) for meeting the AYP goal. (The bottom 30% group would get a green for meeting safe harbor.)
    - The points would be tallied and divided by the total number of possible points for that school. Then, the school would be assigned an overall rating in this way:
        - Less than 50%: Red
        - 50-60%: Orange
        - 60-70%: Yellow
        - 70-85%: Lime Green
        - Over 85%: Dark Green.
    - If a school does not assess at least 95% of its students in two subjects, it is automatically a Red school. If a school is Red for this reason for two consecutive years (or for three out of five years), it is named a Priority school.
    - A school cannot be Green overall if it has a Red on one of its indicators.

How are Priority Schools identified?

- Bottom 5% of schools in the Top-to-Bottom ranking.
- Any school with a graduation rate less than 60% for three consecutive years.
- Any Tier I or Tier II school using School Improvement Grant funds to implement a turnaround model. These are schools that were extremely low performing in previous years and had applied for and been granted federal funds to improve student achievement.
- These schools are also considered Persistently Lowest Achieving (PLA) schools per Michigan legislation.

- Priority schools are organized into four categories.
  - Category 1 – Targeted Needs: 1 year in the bottom 5%.
  - Category 2 – Serious Needs: 2 years in the bottom 5%.
  - Category 3 – Critical Needs: 3+ years in the bottom 5%.
  - Category 4 – Intensive Needs: Recommendation by the MDE School Reform Officer.

What happens to Priority Schools?

- **Supports and Interventions**
  - They are run by the state's School Reform Office, which ensures that Priority schools are making progress toward their goals and intervenes if they are not.
  - The state will provide each Priority school with data on student performance. Schools must add additional data to the state database. Then, the state will provide what's called an intervention specialist to help the school analyze the data and diagnose what is truly causing the school's low performance.
  - Implement one of four intervention models.
    - Turnaround: Replace the principal and at least 50 percent of the school's staff, adopt a new governance structure and implement a new or revised instructional program.
    - Transformation: Develop teacher and school leader effectiveness, which includes replacing the principal; implement comprehensive instructional reform strategies; implement extending learning and teacher planning time; create community-oriented schools; and provide operating flexibility and sustained support.
    - Restart: School districts would close the school and reopen it under the management of a charter school operator; a charter management organization; or an educational management organization selected through a rigorous review process.
    - Closure: The district would close a failing school and enroll the students who attended that school in other high-achieving schools in the district.
  - Districts will be required to use some federal Title 1 funding, earmarked for the poorest of schools, for extended learning time, supports for students who are not proficient in English or students with disabilities, consultation regarding rapid turnaround, release time for a teacher leader to assist with reform, or administration of baseline assessments.
  - Required to organize a School Support Team, which may consist of MDE staff members, district consultants, school peers, and community leaders. The Team will help schools assess needs and target interventions. The lower a school is on the list, the more discretion the support team will be given to make changes.
  - Districts with Priority schools in Category 2 or higher will be required to organize District Intervention Teams with diverse stakeholders to address related to human resources, instructional programs, support of building principals, and communication policy and practice.
  - Priority schools are divided into four categories depending on how long they have been in the bottom 5%, with the longest tenured schools getting the most attention.
  - The lowest-performing category of Priority Schools are recommended to be taken over by the state and put into the Education Achievement Authority (EAA), which is the new school reform district for the state's worst-performing schools. It will include the worst of Detroit's schools in the first year, expanding to the rest of the state in subsequent years. A school will remain in the EAA for at least five years. Any local education agency (public school district) in the state has the option to place schools under the authority of the EAA.
- **Criteria for Exiting Priority Status:** Schools can exit Priority status if they receive a Green, Lime, Yellow, or Orange on the Accountability Scorecard at the end of one year of planning and three years in the Priority school intervention (4 years total). Therefore, a school can only exit Priority status if it meets all requirements of Priority schools, meets proficiency or improvement targets on average overall, increases the proficiency rate of all traditional subgroups, and increases the proficiency rate of the bottom 30% of students.

How are Focus Schools identified?

- Schools are ranked by the size of the gap between the bottom and top 30% of all students in each school, not by gaps between racial or income subgroups. The 10% of schools with the biggest gaps are labeled as Focus schools. Schools that are already identified as Priority are not included as Focus schools.

What happens to Focus Schools?

- **Supports and Interventions**
  - There are a series of interventions in Year 1, including technical assistance, a needs assessment that will help determine what interventions the school requires to improve, and meetings with teachers, administrators, and parents of students in the subgroups that are affected.
  - The MDE will also provide a District Improvement Facilitator to help districts diagnose and prescribe changes in supports to schools. If a district continues to have Focus schools in the second year, these districts must start paying these facilitators out of their own funds, rather than the state's.
  - Districts with Focus schools must set aside Title I funds for interventions, such as professional development and culture/climate interventions. The amount required to be set aside increases the longer the district has Focus schools: 10% in Year 1, 15% in Year 2, 20% in Year 3.
- **Criteria for Exiting Focus Status:** Schools can exit Focus status if they receive a Dark Green, Lime Green, Yellow, or Orange on the Accountability Scorecard at the end of the fourth year after being identified. Schools must also meet at least the safe harbor target for the bottom 30% of students. Otherwise, schools can come off the Focus list if the state recognizes them as "Good-Getting-Great" schools, which can occur if a school submits documentation that the MDE-appointed facilitator and the educators in the school discussed how the unique situation of the school (such as new immigrant students every year) cause the school to have a large gap, even if the school is making progress for all students. To be designated "Good-Getting-Great," the school must also have overall achievement at 75% proficient or above, and the bottom 30% of students must be making rapid progress.

What action, if any, is taken against schools that underperform but don't sink to Priority or Focus status?

- All schools must complete needs assessments, improvement plans and other data on school performance, and the majority of Michigan schools will be ranked on the Top to Bottom list.
- For Orange, Yellow, and Lime Green schools, which only meet state goals for some groups:
  - There are no extra interventions or supports.
  - The color serves as a caution to these schools, and the schools can use the color codes for each subject and group to identify how to make changes for underperforming students.
- For Red schools, which are meeting few or no state goals:
  - Intermediate or emergency school districts will give these schools technical help and improvement plans.
  - Red tells schools they must improve or risk falling to Focus or Priority status.
  - Required to use their annual School Improvement Plan to address the needs of the student groups that did not meet achievement goals.
  - Required to notify parents that the school did not meet its goals and offer choice and transportation to those students choosing to move to another school.
  - During the second year, the school will be required to set aside 5% of its Title I dollars to address the needs of the student groups not meeting goals.
  - During the third and subsequent years, the school will be required to set aside 10% of its Title I dollars for certain interventions and supports that will help to identify and address the root causes of low performance.

How are Reward Schools identified, and what incentives are provided?

- Schools reach Reward status if their performance is either: significantly higher than demographically similar schools; if they are in the top 5% of the state's top-to-bottom ranking; if they are in the top 5% of improvement on the top-to-bottom ranking, or if they improve beyond 85% student proficiency before 2022.
- A school cannot be named a Reward school if it is a Priority, Focus, or Red school.
- Reward schools will be honored in public announcements, featured in MDE promising practice videos, offered financial flexibility, and are given a chance to be visited by the Governor or Superintendent.

How many schools would be identified in each category?

- In August 2012, the MDE released the first round of Priority, Focus, and Reward schools
  - 146 were Priority.
  - 358 were Focus.
  - 286 were Reward.
  - 2622 schools (or 77%) of schools in Michigan were not identified as Priority, Focus, or Reward.
- The color-coded Accountability Scorecard will not be released until August 2013.

Are districts, like individual schools, also held accountable for achievement and gaps?

- The MDE's approved waiver request includes district scorecards, which will be scored the same way as the school scorecards, by aggregating data to the district.
- The state will also produce a list of Focus districts, which will be determined in the same manner as Focus schools (described above). This attention to district-wide performance will hopefully prevent districts from gaming the system by moving low-performing students to one school.
- The MDE will also provide a "watchdog list" of districts that appear to be purposefully steering low-performing students into particular schools.

2. STATEWIDE EDUCATOR EVALUATION SYSTEM

This portion of the waiver requirements is meant to ensure that Michigan has statewide guidelines for teacher and administrator evaluations. In the past, many Michigan educators have not been evaluated regularly and have not been given meaningful feedback on their performance so they can improve. Michigan also lacks a common standard for what effective teaching looks like, making it impossible to compare teacher effectiveness throughout the state and difficult to identify struggling teachers and get them the support and training they need to improve.

Realizing the importance of effective educators on student achievement, the Obama administration proposed its Race to the Top program in 2009, which led to the first recent statewide teacher evaluation reforms in Michigan. State legislation passed in 2011 – also intended to improve educator feedback and support – created the Michigan Council for Educator Effectiveness, which is designing a statewide evaluation system throughout 2012 and 2013.

What are the requirements of the federal waiver?

- Evaluations must show what effect teachers or administrators have on student learning as a significant factor in their evaluations.
- The state must pilot a statewide educator evaluation system no later than 2013-2014, and begin using a state system no later than 2014-2015.
- Individual school districts that opt out of the state evaluation model must develop their own systems that nevertheless meet state standards by summer 2013.

What are Michigan's plans for developing evaluation guidelines?

- The MDE's approved waiver request relies heavily on the Michigan Council for Educator Effectiveness to design an evaluation based in part on student learning. The Michigan Council is led by Dean Deborah

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Expecting the Best Yields Results in Massachusetts

By KENNETH CHANG

BRAINTREE, Mass. — Conventional wisdom and popular perception hold that American students are falling further and further behind in science and math achievement. The statistics from this state tell a different story.

If Massachusetts were a country, its eighth graders would rank second in the world in science, behind only Singapore, according to Timss — the Trends in International Mathematics and Science Study, which surveys knowledge and skills of fourth and eighth graders around the world. (The most recent version, in 2011, tested more than 600,000 students in 63 nations.)

Massachusetts eighth graders also did well in mathematics, coming in sixth, behind Korea, Singapore, Taiwan, Hong Kong and Japan. The United States as a whole came in 10th in science and 9th in math, with scores that were above the international average.

Of course, Timss is only one test, and achievement tests are incomplete indicators of educational prowess. But behind Massachusetts' raw numbers are two decades of sustained efforts to lift science and mathematics education. Educators and officials chose a course and held to it, even when the early results were deeply disappointing.

While Massachusetts has a richer and better-educated population than most states, it is not uniformly wealthy. The gains reflected improvement across the state, including poorer districts.

"I think we are a proof point of what's possible," said Mitchell D. Chester, the state education commissioner.

On a sunny day in May, fifth graders at Donald E. Ross Elementary School here were gathered at an outdoor gazebo, learning about fulcrums by using a ruler set up like a seesaw and balancing weights at both ends.

At South Middle School, seventh graders in a science class worked in small groups to brainstorm how a box of items — a plastic jar, beaker, water, and a mix of sand, soil, clay and

pebbles — could help answer a question posed by the teacher: How do sediments carried in water get deposited? They devised small experiments and wrote down their observations, and at the end of class each group presented its findings.

None of the topics were novel, but they were consistent in their hands-on approach, inviting students to explore and explain. "Much more hands-on than what we ever used to do," said Dianne D. Rees, the district's science director. "Hands-on as much as possible."

Braintree, a town of about 35,000 south of Boston, is neither an inner-city area nor a wealthy suburb. "We're sort of, we used to say, a blue-collar area," said William Kendall, the director of mathematics and technology for the Braintree schools.

When Dr. Kendall arrived in 1973 as a math teacher, the standard approach was talking at the front of the classroom and writing on the blackboard.

Some children learned well from lectures. Others did not. "And it was O.K. those people don't get it, because only we, the math elite, get it," Dr. Kendall said.

Back then, one could graduate from high school without ever taking algebra. "Then came ed reform," Dr. Kendall said, "and now everybody had to learn math."

Ambitious Goals

"Ed reform" was the Massachusetts Education Reform Act of 1993, passed by a Democratic Legislature and signed by a Republican governor, William F. Weld.

The three core components were more money (mostly to the urban schools), ambitious academic standards and a high-stakes test that students had to pass before collecting their high school diplomas. All students were expected to learn algebra before high school.

"It was a combination of carrots and sticks," said David P. Driscoll, deputy education commissioner at the time.

Also noteworthy was what the reforms did not include. Parents were not offered vouchers for private schools. The state did not close poorly performing schools, eliminate tenure for teachers or add merit pay. The reforms did allow for some charter schools, but not many.

Then the state, by and large, stayed the course.

The new achievement test, the Massachusetts Comprehensive Assessment System (MCAS for short), was given to 10th graders for the first time in 1998. (The graduation requirement of obtaining an acceptable score on the 10th-grade MCAS did not take effect until 2003.)

The troubled urban schools performed terribly.

In the small city of Chelsea, which borders Boston, almost 90 percent of the students come from low-income families and most did not speak English as their first language. On the first MCAS, two-thirds of Chelsea 10th graders failed math. The science scores were nearly as dismal.

Two years later, scores in the urban districts showed only glacial improvement. A report from the University of Massachusetts at Boston concluded that the reforms were not delivering on the promises.

Critics worried that when the use of MCAS as a graduation requirement kicked in, thousands of students would be deprived of their diplomas and would drop out in despair. Dr. Driscoll, who was elevated to education commissioner in 1998, kept the MCAS.

"People were expecting it to go away," Robert D. Gaudet, the lead UMass researcher, recalled in a recent interview. "He held to his guns."

Officials did make adjustments. Students who fail the MCAS can retake it several times until they pass, and can still graduate if they otherwise demonstrate they have learned the material.

Test scores have risen markedly. Last year, 54 percent of Chelsea 10th graders were proficient or advanced on the math MCAS.

On tests administered by the federal Education Department, Massachusetts, which had been above average, rose to No. 1 among the 50 states in math.

Building Blocks

Two decades after Massachusetts passed its education reform, there is still much disagreement over what were the crucial components to its success.

Some think it was the added money; others note that successful countries operate schools at much lower costs.

Some think high-stakes testing imposed accountability on administrators, teachers and students; others say that it merely added stress and that the proliferation of tests takes away too much time from learning.

Some think the standards gave clarity on what was expected of teachers and students; others say there is little correlation between well-written standards and student performance.

Officials like Dr. Driscoll say all three components were essential.

Dr. Rees, the Braintree schools' science director, said the standards helped make sure that teachers across the state covered the same subjects, laying the groundwork for subsequent grades.

"There's a logic to that, a progression," she said. "You start learning about solids in kindergarten. In first grade, you learn about solids and liquids, and then in second grade, you start to learn about solids and liquids and gases."

The MCAS has helped Braintree figure out what works and what doesn't. Middle school students were struggling with chemistry questions on the eighth-grade MCAS. The district changed the order of instruction, covering concrete science concepts in sixth grade and moving some chemistry topics to seventh. "And it worked," Dr. Rees said. "They're doing better on their chemistry."

Still, Massachusetts officials admit they have more to do.

While scores have improved across the board, the gap between the highest achievers and the lowest — notably blacks, Hispanics and special education students — has persisted.

Seeing Results

At East Middle School, the elixir is Kristen Walsh, who teaches math to sixth, seventh and eighth graders with so-called special needs, a potpourri of learning disabilities that include dyslexia and autism. On this day she was introducing a lesson on variables and linear equations with a problem involving gym memberships.

She explained the usual math concepts of beginning algebra — the slope of a line indicating the rate of change, the y intercept where the line intersects the y axis. Where she lingered was less the math concepts but the words used in the word problem, repeatedly checking that the students understood that the "start-up fee" of one health club was the same thing as the membership fee at another.

In essence, she was teaching how to interpret a math problem as much as how to solve it.

Dr. Kendall says teachers now laugh when he tells them that it was once possible to graduate from Braintree High School without ever taking algebra. "You can't get out of eighth grade without knowing Algebra I now," he said. "We're teaching it to everybody, and everybody is having success."

The first new math standards in Massachusetts, in the 1990s, echoed the "constructivist" pedagogy then in vogue. Students would construct their knowledge through trial and error, resulting in a deeper understanding.

But many parents rebelled, complaining that their children never mastered basic skills. The state officials in charge of the next revision wanted a back-to-basics curriculum. But Dr. Kendall and others argued that that old approach had already failed.

The "math wars" erupted at the turn of the millennium, culminating in a sort of détente — constructivism was purged, but the new Massachusetts standards did not prescribe a new approach. They stated what students were to learn, but not how teachers were to teach. "What came out of it ended up being a good document, because it contained no pedagogy," Dr. Kendall said.

That allowed teachers like Ms. Walsh to devise and improve.

Take the multiplication table. The traditional approach was to memorize it in order. A strict constructivist would have children figure it out by playing with sticks and other so-called manipulatives.

Braintree combines those approaches, with the teachers guiding the learning in a particular order.

"Now research shows when you're teaching multiplication facts, you should start with the 2s, go to the 10s, go to the 5s, do the 4, the 8, don't hit 0, because the idea of multiplying 0 by 0 is complicated, until they've got a foundation in multiplication," Dr. Kendall said. "Do 0 and 1 in about the middle, and save 7 and 3 until the end, because those are the really hard ones."

He added, "We're helping them construct their own knowledge in a way that is successful."

Abby Federico, one of Ms. Walsh's special-needs students, said her mother told her the middle school math curriculum was much more advanced than when she was in school. "She was like, 'I learned this stuff in high school,' " Abby said.

Dr. Kendall said that special needs students in Braintree used to routinely fail the math MCAS. Now those in Ms. Walsh's class often get "proficient."

"It's pretty easy in my opinion, because Ms. Walsh usually teaches us a lot of methods to use in math to make it seem easier," Abby said, adding that she might even choose a career that requires math skills.

"Math is pretty nice," she said.

The Education Trust–Midwest

Education Trust-Midwest Statement on "A to F" School Accountability Bill, HB 5112

November 13, 2013

Thank you for giving us the chance to speak to you today about HB 5112, the proposed A to F school accountability bill. I am Amber Arellano, the executive director of the Education Trust-Midwest. With me today is Daria Hall, the Director of K-12 Policy Development at the national Education Trust. Daria is one of the country's foremost experts in school accountability. Ed Trust – Midwest is a non-partisan, data-driven education research and advocacy organization that promotes high academic achievement for all students at all levels – pre-kindergarten through college. Our goal is to close the gaps in opportunity and achievement that consign far too many young people – especially low-income students and students of color – to lives on the margins of the American mainstream. We work to be a source of non-partisan information and expertise about Michigan students.

Ed Trust – Midwest and the national Ed Trust have long been supporters of strong school accountability systems. Done right, they are an essential tool in the effort to close gaps between groups and raise achievement for all students.

We are here today to discuss the bill's merits and improvements to the bill that would ensure greater transparency and honest information for all Michigan parents and stakeholders – and would provide our state the flexibility needed to adapt as we adopt new assessments and get better data on student performance in the coming years.

Good accountability systems:

1) Set clear, ambitious but achievable goals for educators to work toward;

2) Provide regular signals about school performance to parents, community members, and policymakers;

3) Reward schools that are successful with all students; and

4) Prompt meaningful action when schools aren't serving all students well.

A to F letter grades can be part of a strong accountability system by providing clear, transparent, comprehensible signals of school performance. As such, the Ed Trust-Midwest supports the

concept of A to F grades. In fact, ETM was one of the first organizations in Michigan to call for A to F school grading during the development of the state's new accountability system.

But A to F grades are only as good as what's underneath them. They serve their intended purpose of clarity and transparency only when they clearly signal how schools are doing on the most important indicators of achievement and improvement for all students. When, instead, they're based on flawed or incomplete measures, they actually undermine clarity and transparency – because parents assume they know what an "A" or a "C" means, even when they actually don't. Flawed school grading systems, in other words, can actually set thoughtful school accountability back.

The proposed A to F grading system in House Bill 5112 gets many things right. It sets expectations for both current-year performance and growth over time. Both are critical measures of school success.

HB 5112 also gets it right by including school performance in multiple important subject areas, including the gatekeeper subjects of reading and math but also writing, social studies, and science. And it recognizes the importance of high school graduation rates and other measures of college and career readiness for our secondary students.

Finally, HB 5112 gets it right by ensuring the Michigan Department of Education will report on the aggregate number of effective and highly effective teachers in a school under the new educator performance system, which if done right, would give parents and communities a better sense of the teaching quality in their public schools – while respecting individual teachers' evaluation ratings as the development tool that they are, not making them public.

However, the bill is missing some important components that are absolutely essential to any good accountability system.

Our recommendations include:

1. **Hold schools accountable for the performance of low-income students, students of color, students with disabilities, and English language learners**

Clear expectations for all groups of students – including low-income students, students of color, students with disabilities, and English language learners – are essential. By excluding these groups from the proposed A to F grading system, HB 5112 runs the risk of taking Michigan back to a time when the performance of the very students who most need our attention and support was swept under the rug. Michigan's students can't afford this huge step back. Nor can our communities or our economy. In addition, the U.S. Department of Education has long valued the inclusion of these groups, and we do not expect that to change.

To help illustrate how disastrous a retreat from subgroup accountability would be for Michigan, please allow me to share some brand-new data from the National Assessment of Educational Progress, a rigorous assessment that students in all states participate in:

- Michigan is one of the nation's lowest performing states for African-American, Latino and low-income students:
    - In 4th grade math, our African American students don't just rank considerably below our white students—they rank dead last when compared with African American students in all other states.
    - Our low-income 4th graders are near the bottom in math, too, performing well-below low-income students in Indiana and Minnesota—and at about the same level as low-income students in Alabama.
    - In 8th grade math, our Latino students rank 43rd out of 46 states.

The underperformance of low-income students and students of color in Michigan has grave consequences for them. Unless we turn these patterns around, many of these young people will be literally locked out of decent, family-supporting jobs. But the consequences are grave for our state, as well. Together, low-income students comprise almost half and students of color make up a quarter of our current students – and future workers.

Some assume that Michigan can "take care" of this problem by including in school grades growth measures for the bottom 30 percent of students in each school. But it turns out that measuring growth among the lowest achievers is not a substitute for meaningful accountability for all groups of children. As you well know, not all low-income students or students of color perform at the bottom, and to assume they do is not only inaccurate, but offensive.

Fortunately, this problem can be addressed with relative ease by including, as part of the A to F grading formula, proficiency for all groups of students – including low-income students, students of color, students with disabilities, and English language learners – in the 5 tested subjects. Likewise, it should include as part of the formula subgroup growth in reading and math.

2. **Allow time and flexibility to build a system based on Michigan's reality and real data – and supports our educators' and students' transition to new assessments**

Michigan is currently in the process of adopting new state assessments and a student growth model that will give us more and better information on whether our schools are on a path to raise student performance to college-and-career-ready levels. These data – as the timeline of the current bill acknowledges – will not be available for several years, making it impossible to model the results of this proposed system in actual data.

That's a problem. Without real data, we cannot be certain that the system we have designed actually works as we intend. Indeed, if we have learned anything about accountability over the last decade, it is how easily good intentions go wrong without real data.

Again, there is a fix here that needn't slow down Michigan's transition to an accountability system using letter grades.

Here's what we propose: that the bill include clear specifications for a school accountability system to be implemented at the conclusion of the 2015-16 school year. Those specifications should include a requirement to assign A to F grades and a requirement that those grades be based on the performance and growth of students overall and all groups of students. But they should stop short of specifying the precise measures or points allotted. In order to get accountability right, the Michigan Department of Education needs latitude in analyzing the new data when it comes in and in designing measures and a grading scale that accomplish what you intend – and a system that makes good sense for Michigan.

Until this new A to F grading system is enacted, the Michigan Department of Education should continue to operate the existing accountability system. Its color codes may not be perfect, but it is considerably better than what it replaced.

3. **Include measures in addition to assessment results**

Assessments provide critical information about what students are learning, and that must always be at the heart of our school accountability system. However, research supports what many parents intuitively know: tests alone don't tell the whole story. There are other important indicators of school performance and quality.

The proposed bill already provides flexibility to include measures of college and career readiness in high school accountability, such as the percentage of students completing the Michigan Merit Curriculum, Advanced Placement, and IB classes, and the percentage of students enrolling in post-secondary education and training.

We recommend you go just a little bit further by also allowing the MDE flexibility to include a limited number of additional measures for all schools, including factors such as attendance, results from student and parent surveys, and a measure of school "climate" that would focus on whether students and teachers are getting the supports they need to succeed.

4. Reward high performing schools and intervene powerfully in the lowest-performing schools

As important as it is to get the A to F grading system right, it's equally important that school grades are accompanied by meaningful action.

Consistently high-performing schools should always be held accountable, but should be granted autonomy from some state requirements. HB 5112 gives the Department of Education the ability

to grant such flexibility to schools that earn As or Bs. MDE should follow the example of leading states by granting these schools flexibility from certain improvement planning requirements.

The bill provides for consequences to consistently low-performing schools in the form of closure or state takeover. After a school receives an "F" grade, it needs to get support and intervention from the state, with clear goals for getting a higher grade. If the school does not improve, the Superintendent should have discretion to determine a course of action. Closing individual schools or turning them over to the Education Achievement Authority should not be done without consideration of the turnaround efforts on-going at those schools. In some cases, Michigan foundations and other institutions have invested millions of dollars and they are in the early stages of turnaround work. The Superintendent should be given latitude to consider early signs of improvement before making a decision about school closure or state takeover.

And the bill should go further to prompt interventions in low-performing schools *before* getting to the point of closure or takeover. Research shows successful school turnaround always starts with a strong staff, and some states are acting on that. For example, in Florida, districts cannot employ teachers who do not receive at least an effective rating on their evaluation in "F" schools. Likewise, the district must ensure that "F" schools get principals with a record of raising achievement in similar schools.

Michigan should follow suit and link staffing decisions in "F" schools to the results of educator evaluations.

5. Hold alternative schools accountable

Parents and students of alternative public schools deserve to know how those schools are performing, just as other Michigan families do. And alternative schools need to be held accountable for their performance, just as other schools are. Otherwise, the risk is that Michigan will have more and more alternative schools, and less and less accountability.

To address this problem, we recommend that the definition of alternative campuses be tightened so that schools with very low graduation rates are not exempted from accountability. We also suggest that you direct the MDE to develop an accountability framework for genuine alternative schools that still provides reliable information to parents and prompts action when students in these schools are not being served well.

Conclusion

As you work to finalize this legislation, we hope these suggestions are helpful. Certainly, the intent of this bill is a good one, including its emphasis on ensuring student growth is a significant consideration in the state's school accountability system and the assignment of A to F letter grades for schools. Unless what is underneath those grades is well-conceived and drives change for all of Michigan's children, we won't achieve our shared purposes.

By making these several changes, you can ensure, though, that schools are held accountable for all groups of children; that parents get the information they need to make good decisions on

behalf of their children; and that the proposed grading system will be grounded not just in good ideas, but in good data.

Thank you for your time today.

Ball of the University of Michigan's School of Education. The Council is working feverishly through 2013 to design such a system. Under the waiver requirements, Michigan's evaluation guidelines must include a method to: measure student growth; evaluate other assessment tools that measure student growth; observe teachers' classroom performance; and train these classroom observers.

- Michigan's 2011 legislation includes provisions for strengthening evaluations, and is aligned with the federal waiver requirements.
- The MDE plan to train classroom observers is based on research from the respected Measures of Effective Teaching (MET) study, funded by the Bill & Melinda Gates Foundation.

How will MDE ensure that each district develops a high-quality evaluation if they decide to opt out of the statewide system?

- Local districts will have the freedom to adopt interim guidelines in the 2012-2013 school year. But they must then adopt the Council's evaluation guidelines by 2013-2014, or whenever it is completed.
- Until then, the state will help individual districts develop best practices, educate them on what will be required in the future and provide districts with information to measure student growth in reading and math in grades 3-7.

3. COMMON CORE: College- and Career-Ready Expectations for All Students

State and national leaders agree our nation's students are not adequately prepared to compete in the global economy. That's why new Common Core State Standards are being developed by educators in coordination with the nation's governors, the business community and others. These standards represent what students need to know to be prepared for college and career.

Michigan is one of 45 states and the District of Columbia to adopt the Common Core, which are more rigorous than current Michigan standards. Under the waiver requirements, Common Core must be in place by 2014-2015. At that time, Michigan will replace the Michigan Educational Assessment Program (MEAP) and high school Michigan Merit Exam with Common Core assessments designed by the Smarter Balanced Assessment, one of two national consortiums designing assessments aligned with the Common Core, which are expected to make it easier to measure student growth over time.

How is Michigan preparing to transition to the Common Core?

- Michigan has signed on to the Smarter Balanced Assessment Consortium and has set new rigorous "cut" scores (the scores students have to get on state assessments to be counted as proficient on them) to better align current assessment standards with the rigor of Common Core. New formative, interim, and summative assessments will be fully adopted by 2014-2015.

What training is the MDE providing to help teachers learn and teach to the Common Core?

- The MDE has partnered with the Michigan Association of Intermediate School Administrators to develop units and lessons for all educators to download for free. The resources are aligned to the Common Core in English language arts and mathematics for kindergarten to eleventh-grade.
- The MDE said it's using professional development to support teachers' instruction of English language learners in academic courses, such as math and history.
- The MDE will hire consultants to work with Priority, Focus, and other low-performing schools on instruction aligned with the Common Core.

Michigan's full approved ESEA flexibility request can be found here:

http://www.michigan.gov/documents/mde/ESEA_Flexibility_Request_FINAL_377829_7.pdf